

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

A.B.S., as surviving daughter of deceased)
ANTHONY L. SMITH, and a minor, by)
and through her next friend CHRISTINA)
WILSON,)

Plaintiff,)

v.)

MAYOR FRANCIS SLAY, THOMAS)
IRWIN, BETTYE BATTLE-TURNER,)
RICHARD GRAY, THE ST. LOUIS CITY)
BOARD OF POLICE COMMISSIONERS,)

and)

JASON STOCKLEY)

Defendants.)

Case No.: 4:12-cv-00202-JCH

JOINT PROPOSED SCHEDULING PLAN

Pursuant to this Court's Order (Document 138), the parties have conferred via telephone and in writing and prepared the following Joint Proposed Scheduling Plan:

1. The parties may propound interrogatories, requests for production, or requests for admission to any other party beginning on April 9, 2018.
2. The responding party must serve its answers and any objections within 30 days after being served with interrogatories, requests for admissions or requests for production.
3. The presumptive limits of twenty-five (25) interrogatories per party shall apply.
4. The parties shall make a good faith attempt to resolve discovery disputes without judicial intervention in writing and by telephone conference prior to filing any Motion to Compel.

5. All written discovery shall be completed no later than June 15, 2018.
6. All Motions to Compel shall be filed no later than June 25, 2018.
7. Depositions shall be completed by July 31, 2018. Attorneys for Dana Redwing and the Board of Police Commissioners will request the deposition of Attorney Albert Watkins and anticipate other depositions may also be necessary. Plaintiff may request the depositions of Dana Redwing, Jason Stockley, Robert J. Isaacson, H. Anthony Relys, personnel with the St. Louis City Circuit Attorney's Office, individuals identified in forthcoming document production as being links in the chain of custody of the subject DNA evidence, presently unknown personnel with the Attorney General's Office, members of the Board of Police Commissioners and other individuals whose identities and/or relevance to Plaintiff's inquiry may become known as a result of discovery in this matter. Nothing herein shall be construed as consent by any party to the requests for deposition set forth above.
8. Plaintiff's supplemental brief on the Motion For Show Cause Hearing and/or Motion for Sanctions shall be filed no later than August 24, 2018.
9. Defendants' supplemental briefs in opposition to the Motion for Show Cause Hearing and/or Motion for Sanctions shall be filed no later than September 24, 2018.
10. The parties agree to participate in mediation and such mediation would be most productive after July 31, 2018.
11. Should the Court wish to conduct a hearing on the Motion for Sanctions or enter an Order to Show Cause why one or more Defendants should not be held in contempt, the earliest date this case will be ready for hearing is October 8, 2018.
12. The parties expect the hearing to last one to two days.

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CERTIFICATE OF SERVICE

I hereby certify that on this the 3rd day of April, 2018 a true and correct copy of the foregoing document was electronically transmitted to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic filing to all counsel of record.